

# Monthly Update



## Summer Food Service Program

April 15, 2024

*Distributed to Summer Food Service Program Authorized Representatives and posted at <https://cnw.ksde.org>, SFSP, SFSP Monthly Updates*

### **SFSP Administrative Training – Complete by May 15, 2024**

Are you planning to offer meals through the Summer Food Service Program (SFSP) this summer? All new and returning sponsors must have at least one representative complete the SFSP Administrative Training in order to operate the SFSP in summer 2024. The training must be completed by May 15. A recording is now available on the KSDE Training Portal at <https://learning.ksde.org>, Child Nutrition & Wellness, Summer Meals.

### **Non-Congregate Meal Service in Rural Areas Training – Complete by May 15, 2024**

If your sponsor is planning to offer non-congregate meals through the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO) in summer 2024, at least one sponsor representative must attend the Non-Congregate Meal Service in Rural Areas Training. The training must be completed by May 15. A recording is now available on the KSDE Training Portal at <https://learning.ksde.org>, Child Nutrition & Wellness, Summer Meals.

### **Updated SFSP Forms for 2024**

Many SFSP forms have been updated to reflect recent changes in SFSP policies and guidance. Updated forms include:

- <https://cnw.ksde.org>, SFSP Admin Handbook, Chapter 4, Related Forms:
  - Daily Meal Count Form
  - Meal Consolidation Form
- <https://cnw.ksde.org>, SFSP Admin Handbook, Chapter 2, Related Forms:
  - Preoperational Site Visit Form
  - Site Visit Form
  - Monitor Site Review Form
  - Enrollment Certification
- Located on the KNCLAIM Checklist Tab:
  - Training Certification Form

### **USDA Guidance**

#### **Non-Congregate Meal Service in Rural Areas: Questions and Answers #2**

This memorandum is the second set of questions and answers on the rural non-congregate summer meals option established through the Consolidated Appropriations Act, 2023 (the Act) (PL 117-328), and codified through the interim final rulemaking (IFR), Implementing Provisions from the Consolidated Appropriations Act, 2023: [Establishing the Summer EBT Program and Rural Non-congregate Option in the Summer Meal Programs](#) (88 FR 90230). The Act authorized permanent, non-congregate meal service through the Summer Food Service Program (SFSP) and National School Lunch Program's (NSLP) Seamless Summer Option (SSO) for rural areas with no congregate meal service.



The purpose of this memorandum is to address additional implementation topics based on feedback received by state agencies and program stakeholders. The first memorandum in this series, [SFSP 07-2024, SP 13-2024, Non-Congregate Meal Service in Rural Areas Questions and Answers](#), Feb. 21, 2024, updates earlier guidance originally issued for Summer 2023 operations and ensures consistency with the provisions of the IFR. This memorandum can be found at: [Non-Congregate Meal Service in Rural Areas: Questions and Answers 2 \(azureedge.us\)](#).

### Highlighted Q & As:

**10. Q. Is each stop along a non-congregate mobile meal pick-up route (i.e., not home delivery) considered a site?**

- A. Yes, each stop along a non-congregate mobile meal pick-up route is considered a site. A non-congregate mobile meal pick-up route may include stops at parks, local recreation areas, etc., similar to a congregate mobile meal route where each stop must be an approved site. Sites along a non-congregate mobile meal route must meet the site eligibility criteria at 7 CFR 225.6(h)(3) and are subject to the same Program monitoring requirements. This includes having adequate supervisory and operational personnel for overall monitoring and management of each site.

**11. Q. For sponsors proposing to provide both congregate and non-congregate meal services at the same site (hybrid), is it acceptable to offer a non-congregate meal during congregate meal service, if the non-congregate meal is intended for a different meal service time?**

- A. A non-congregate meal can be provided after a child receives and consumes their congregate meal. For instance, if a hybrid site plans to offer a congregate breakfast and a non-congregate lunch because they lack activities to keep children onsite for both meals, they could serve the congregate breakfast and then provide the non-congregate lunch as the children are leaving the site. However, it would not be acceptable to provide the non-congregate lunch and congregate breakfast simultaneously as outlined in Program regulations at 7 CFR 225.6(h)(4)(ii). Additionally, the sponsor must have a system in place to prevent meal service overlap, ensuring children do not receive more than the maximum daily meal allowance as required in 7 CFR 225.16(b)(3). In the above example, participants should be informed that the meal being provided is intended to be consumed for lunch that same day.

**20. Q. In what situations could a conditional non-congregate site be approved?**

- A. A conditional non-congregate meal site is best utilized when targeting children that reside in non-area eligible locations but qualify for free or reduced price school meals. These children would be sought out by Program sponsors and enrolled at the conditional non-congregate site. Since these sites require individual eligibility to be documented prior to claim submissions (7 CFR 225.6(g)(1)(xiv) and (g)(2)(viii)), sponsors should enroll children prior to the start of conditional non-congregate meal service operations, or at a minimum prior to each meal distribution.

**21. Q. Can unused reimbursement be utilized to cover the cost of meals served to children who do not meet the eligibility requirements of conditional non-congregate sites?**

- A. No. Using unused reimbursement funds to cover the cost of ineligible children at conditional non-congregate sites is not an allowable cost. FNS Instruction 796-4, Rev. 4 and SFSP 11-2015, Assessing Costs in the Summer Food Service Program, February 25, 2015, prohibit SFSP funds to be used for costs for meals, in excess of the number of meals eligible for reimbursement.



Program sponsors can only use non-program funds to cover the cost of meals that are not eligible for reimbursement. In accordance with 7 CFR 225.9(g), sponsors should use any unused reimbursement to improve the meal service or management of the program. As outlined in SFSP 13-2023, Unused Reimbursement in the Summer Food Service Program, September 28, 2023, sponsors can use unused reimbursement for improving the quality of food provided, upgrading meal service sites or food preparation facilities, enhancing monitoring, training, and other oversight activities, or it can be used as program payments (start-up funds or advance payments) for the following year.

**Q. 22. Are conditional non-congregate sites permitted to charge for meals provided to children who do not meet income eligibility requirements? How can overt identification be avoided?**

- A. Sponsors of conditional non-congregate sites have the option to charge non-eligible children a separate fee for meals, but they must establish a process for collecting payments for these children. Additionally, the process that sponsors implement must prevent overt identification of children receiving free meals as described in Program regulations at 7 CFR 225.6(f)(1)(iii). To avoid overt identification, enrolled children can prepay for meals, or sponsors can use non-Federal funds to cover meals for non-eligible children, as some examples.

**Q. 25. Could adults other than parents or guardians and with written permission on file from the household pick-up meals on behalf of parents or guardians?**

- A. No, only parents or guardians may pick-up meals on behalf of their children (7 CFR 225.16(i)(2)). Other adults (i.e., proxies) may not pick up meals without the child(ren) present.

**Q. 27. Is it permissible for a childcare provider, such as a day care operator or childcare center operator, located in a rural area to collect meals for the children who attend their childcare services?**

- A. No, childcare providers cannot collect Program meals on behalf of parents or guardians for children attending their childcare. Childcare providers who care for whole groups of unrelated children formally enrolled in their care should not be considered guardians under the State agency's definition. Allowing a childcare provider to collect and distribute meals on behalf of groups of children introduces significant integrity risks, especially concerning meal duplication, ensuring meals reach eligible children, and food safety risks during transportation, storage, or distribution. In cases where children in childcare settings could benefit from non-congregate meals, FNS strongly encourages State agencies and sponsors to collaborate with local childcare providers. They should explore the feasibility of these providers becoming summer meal sites or participating in the Child and Adult Care Food Program (CACFP) to support meals for children in their care.

**Q. 28. What are examples of documented procedures sponsors can use to prevent duplication of meal services when offering parent or guardian meal pick up?**

- A. Program regulations at 7 CFR 225.16(i)(2) require that sponsors choosing to distribute meals to parents or guardians on behalf of their children must, through documented procedures, approved by their State agency, ensure that meals are only distributed to parents or guardians of eligible children and that duplicate meals are not distributed. Some possible strategies for enhancing integrity include, but are not limited to:



- Requesting parents and guardians provide their children’s names or other identifying information when picking up meals,
- Using rosters or sign-in sheets, Page 14 of 24,
- Cross-referencing sign-in sheets, such as for a sponsor with multiple sites in close proximity, and
- Using technology-based solutions, such as QR codes for sign-in sheets, or a registration system.

When developing procedures, sponsors should consider the proposed site type (e.g., open, closed) and whether the proposed system is appropriate or could potentially hinder access for eligible children. In addition, sponsors may review site meal counts daily to track trends and identify anomalies such as block claiming and overclaims.

**Q. 30. Can non-congregate home delivery service be provided at addresses where the child does not reside?**

- A. No. As outlined in Program regulations at 7 CFR 225.14(d)(6), non-congregate meal delivery should only be sent directly to a child’s residence with prior written consent from a parent or guardian. Non-congregate home delivery may not be sent to daycare home programs, short-term rentals, or vacation properties.

**Seamless Summer Option (SSO) or Summer Food Service Program (SFSP) 2024**

Now is the time to sign up or renew as a summer meals Sponsor. For questions about the SFSP or the Seamless Summer Option (SSO) for School Nutrition Program (SNP) Sponsors only, a Summer 2024 Comparison Chart has been developed to assist Sponsors to explain options and is posted at <https://cnw.ksde.org>, SFSP, SFSP What’s New. Contact our office at 785-296-2276 or your area KSDE child nutrition consultant to discuss options for Summer 2024. SFSP applications are due May 1. See the following for Summer Food Service Program training opportunities.

**Reminder: Sponsors serving summer meals must complete renewal and be approved before operations may begin.**

**Online Professional Development – Classes and Tutorials**

CNW staff continue to develop new interactive online trainings and tutorials that can be accessed free of charge 24/7 via the KSDE Training Portal. Accounts can be created at <https://learning.ksde.org>. For detailed instructions on creating an account, go to <https://cnw.ksde.org>, Training, How to Create Online Account. Trainings and tutorials specific to SFSP include: SFSP Menu Planning (2 hrs), Serving Safe Summer Meals (1 hr), Summer Food Service Program: Daily Meal Count Form (20 min), and SFSP Food Safety Toolkit (20 min).

**SFSP Menu Planning Training – April 23 at 2 pm**

Join CNW for this 2-hour training to learn about food crediting, meal pattern requirements, and Offer vs. Serve in the Summer Food Service Program. The training will be offered live via Zoom at the following link: <https://ksde.zoom.us/j/83973868163?pwd=MDBFcG9HdmFvczFZck5mTTFVcjcyQT09> (Passcode: 922390). For those unable to attend the live training, a recording is available on the KSDE Training Portal.



### Upcoming Webinars from No Kid Hungry

- **Fueling Participation: Boost Engagement in Your Non-Congregate Summer Meals Program Through Marketing and Promotion**

**Tuesday, April 16<sup>th</sup> at 2 pm ET**

Elevate your summer meal program's reach and impact by joining our upcoming webinar! Gain invaluable insights into targeted marketing techniques designed to drive increased participation and ensure no child goes hungry during the summer break. From tailored outreach to community engagement, learn how to effectively promote your program and make a lasting difference in your community.

- **Breakfast Tips & Strategies for Fueling Success in Rural Districts**

**Tuesday, April 23<sup>rd</sup> at 2 pm ET**

Join us as we speak with school nutrition professionals who are leading the way with Breakfast After the Bell in rural school districts. They will share their experiences of implementing these innovative breakfast models to reach all kids with their meals, and their unique challenges. Expert speakers will share their insights on successful strategies for implementing and sustaining breakfast programs in rural settings, drawing upon examples they have used and best practices.

- **Maximizing Resources: Financial Strategies and Staffing Solutions for Non-Congregate Summer Meals**

**Tuesday, April 23<sup>rd</sup> at 2 pm ET**

Join us for an insightful webinar tailored to financial management and staffing considerations in non-congregate summer meals programs. Delve into effective strategies for optimizing budgets, leveraging community partnerships, and staffing solutions to ensure seamless operations and maximum impact in feeding children during the summer months. Learn from experts in the field and gain practical insights to enhance the efficiency and sustainability of your program, empowering you to make a lasting difference in combating childhood hunger.

- **Unlocking Access: Implementing Home Delivered Meals to Expand Summer Meal Access for Rural Families**

**Thursday, April 26<sup>th</sup> at 2 pm ET**

Flexibilities in the rural non-congregate summer meals program allow for meals to be delivered directly to students' homes. Community organizations and school districts have the option to explore what a home delivery meal model can look like. In this webinar, we will explore practical approaches and best practices for establishing and enhancing home delivery services within the summer meal program. Learn how three expert organizations planned and implemented home deliveries during summer 2023 and how they are planning for success in summer 2024.

- **Summer Success: Boosting Participation with Expert Menu Planning**

**Tuesday, April 30<sup>th</sup> at 2 pm ET**

Explore menu creation and recipe development designed specifically for rural non-congregate summer meal service. In this webinar, three child nutrition experts will share their experience in menu planning for summer meal services. Our experts will provide attendees with invaluable strategies and ideas for preparing appealing and nutritious summer menus aimed at increasing child participation in summer meals.



### Summer Kick-Off Events

Kick-off events are a great way to build awareness among parents, recruit volunteers, and create excitement around Summer Meals! Please share with CNW your plans for kick-off events this summer by emailing Emily Bonilla at [ebonilla@ksde.org](mailto:ebonilla@ksde.org).

### SFSP and Local Foods: A Dynamic Duo!

#### Local Food Sourcing at the Farmers' Market

Farmers' Markets are a great way to source locally throughout the summer months. The Farmers' Market provides locally grown produce, meat, and eggs, and can be a great way to connect with farmers and ranchers in your community. You can find a list of registered Farmers' Markets [here](#).

### Summer Outreach Materials

KSDE has free promotional materials for your site to use this summer, including yard signs, feather flags, and door hangers. Portable hand-washing station supplies are available to any Sponsor operating a meal service site without access to running water. New sites are also eligible for a Team Nutrition kit and/ or a Summer Meals Food Safety kit. Contact Katy Hatch at [khatch@ksde.org](mailto:khatch@ksde.org) to request materials.

### The CNW Team



For more information, contact:

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